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State Courts
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February 28, 2025

Hon. Kiyo Matsumoto
U.S. District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. DAWOOD KASSIM, 24-cr-0067

Your Honor:

I am counsel for the above-named Defendant, Dawood Kassim.

On March 4th, 2024, Mr. Kassim was released on Bail. Pursuant to his terms of release he must be at his residence no later than 10:00 pm. If you recall, at our last appearance, I made the request that he be permitted, solely for the term of Ramadan, that his permission to stay out, be extended to 2:00 a.m.

The reason for this is that under his Mosques current schedule, the prayer period designated as Taraweeh starts at 10:30 p.m., and ends at 2:00 a.m., the following day. During this period there are multiple sessions, during which long portions of the Quran are read. This end time will allow him to attend all prayer sessions, and return home.

The Mosque is located at 682 Wyona St. Brooklyn, NY 11207. This is where he will be the entire extended time. The Imam at the Mosque is Imam Zamlah Saleh.

On February 18, 2025, after my communicating with Pre-Trial services, his PTS Officer, Ms. Sandra Eden, emailed me that:

From: Samantha Eden <samantha_eden@nyept.uscourts.gov>
To: Bernie Kleinman <attrnylwyr@yahoo.com>
Sent: Tuesday, February 18, 2025 at 03:37:34 PM EST
Subject: RE: Dawood Kassim, 24cr67

Good afternoon,

Hon. Kiyo Matsumoto, U.S. District Judge, E.D.N.Y.
Re: US v. Kassim, 24cr0067
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Mr. Kassim submitted documentation for Ramadan, and we have reviewed it. Pretrial Services does not have any objections to this request. We do request that there be given an end date to the extension of his late-night worship services after Ramadan concludes.

Thank you,

I have forwarded this information to the U.S. Attorney, and have not, as yet, received any response as to their position on this matter.

I do apologize for the lateness of this email (as Ramadan commences tomorrow night) however, I was not able, until this morning, to get final clarification from Mr. Kassim, after meeting with him in my office in Westchester County, as to the dates and times.

With regard to an end-date, it is requested that this extension terminate on April 01, 2025.

Your attention to this request is deeply appreciated.

Respectfully submitted,

/s/ Bernard V. Kleinman
Bernard V. Kleinman, Esq.
Attorney for Defendant KASSIM

cc: All counsel of record by ECF